

IN THE UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
BUTTE DIVISION

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KEVIN BRIGGS,

Plaintiff,

vs.

GALLATIN COUNTY and  
JOHN DOES 1-8, as  
individuals and in their official  
capacity as detention officers,

Defendants.  
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CAUSE NO. CV 18-0010-BU-BMM-JCL

DEPOSITION OF KEVIN BRIGGS

Great Falls, Montana  
July 22, 2019  
10:49 A.M. - 3:13 P.M.

APPEARANCES:

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1 plastic from a deodorant thing and killed himself.

2 I'm like, no, I don't really think that's a  
3 good policy. Leaving somebody in there -- Somebody  
4 is suffering from mental health problems and you  
5 leave them in a box with nothing for weeks on end? I  
6 think that's horrible. I'd get mad at somebody for  
7 doing that to their dog.

8 Q In booking, you can, you can still see out  
9 into the common area, right, and maybe talk to some  
10 people, or did they not let you talk to anyone?

11 A They generally wouldn't let me talk to  
12 folks. There were sometimes staff that would talk to  
13 us, but for the most part, we're just in a room --  
14 There is glass that we can see out, but for the most  
15 part, we're just in a room by ourselves with nothing.  
16 And seeing people sitting at a desk doesn't really  
17 offer much comfort, especially since a lot of them  
18 would be rude if we tried to talk to them anyway.

19 Q And in booking on suicide watch, you weren't  
20 allowed any reading materials or anything like that?

21 A After a couple of -- well, after, like, a  
22 week, they let me have a Bible. They also I think  
23 tried to write me up for, like, making little  
24 offerings of some portions of my food. It was a  
25 religious thing, but they wanted me to stop making

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1 religious offerings of my food and read a Bible.

2 Q "Religious offerings" meaning you would set  
3 aside an amount of your food and not eat it?

4 A Yeah.

5 Q So it would just be sitting in your cell,  
6 essentially?

7 A It would be sitting off in a corner of my  
8 tray or I would flush it, and that would be a  
9 religious sacrifice.

10 Q They told you not to do that?

11 A Because I can't, like, put it in a fire or  
12 bury it under a tree or anything like that.

13 Q And they told you not to do that?

14 A Yeah.

15 Q Do you remember who told you that?

16 A Taylor and Clark and maybe -- I feel like  
17 there was a guy with sort of a Hispanic name that  
18 started with an "H." Oh, and Sergeant Miller.

19 Q Did they give you a reason why they were  
20 telling you not to do that?

21 A I don't really recall a reason. They just  
22 said, "Don't do it." And I said, "Well, this is my  
23 religion here. I feel like I should have a right to  
24 make religious offerings here. I'm not going to tell  
25 you guys not to have a cross or do communion."

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1 Q I'll move on to May of 2014. And I  
2 apologize for kind of reaching over and looking. So  
3 from this, it looks like you were in a holding cell  
4 after your first suicide attempt, and it looks like  
5 only a day. I don't know if that -- If you could  
6 confirm that. We've got some handwritten notes on  
7 this saying "strangulation mark." It says April 19,  
8 2014, and it says April 19, 2014, as well for the end  
9 date.

10 A Yeah. That sounds about right.

11 Q So just a day in booking for that, and then  
12 it looks like they put you back in D Pod. Does that  
13 seem about right?

14 A Uh-huh.

15 Q The next incident reports I have are from  
16 May of 2014. I think you were in D Pod during that  
17 time. The first one I have is an incident where you  
18 refused a couple meals in a row.

19 A Uh-huh.

20 Q And we've already talked about fasting and  
21 your reasons for doing so. Anything different about  
22 this incident compared to what you've already told  
23 me?

24 A Not to my recollection. No.

25 Q The next one I have is the day after

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1 May 8th, and there's a number of incident reports  
2 from a number of different officers describing an  
3 incident you had with a razor blade, maybe a couple  
4 razor blades. Describe to me what was going on then  
5 and what happened.

6 A I cut my wrist and my -- I don't know why I  
7 went for the crook of my elbow. That's totally got  
8 the wrong blood pressure to try to bleed out from. I  
9 also went for my armpit. And then I severed my  
10 tongue in half, front to back, because I heard it  
11 bleeds a bunch, and I was trying to bleed to death.

12 Apparently, I didn't go deep enough or  
13 something. I don't know. But I kept trying to bleed  
14 out and trying to, trying to run cold water over it  
15 to keep it bleeding, and it wasn't working. And then  
16 I guess at some point I lost consciousness and was  
17 taken to the hospital. And then I was placed in  
18 booking.

19 And I noticed here the date says booking --  
20 or out of -- Okay. So booking 5/10, and then holding  
21 cell 3. I think I was actually, I think those were  
22 the same holding cell or maybe the one next to one  
23 another. But either way, it was still holding cells  
24 in booking.

25 Q So you're telling me the entry May 10th,